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*\*Board Certified - Personal Injury Trial Law Texas Board of Legal Specialization*

March 29, 2019

Regional Freedom of Information Officer  
U.S. EPA, Region 6  
1445 Ross Avenue (6MD-OE)  
Dallas, TX 75202-2733

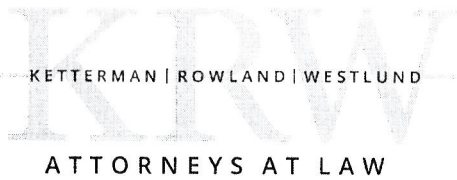
Dear Sir or Madam:

I am making this request pursuant to the Federal Freedom of Information Act and the Texas Public Information Act formerly known as the Texas Open Records Act.

By this letter, I am requesting copies of the complete file including any and all investigative and other documentation maintained by your office relating to the incident ultimately resulting in the death of Celerino Santiago Tongson, which occurred on or about April 15, 2018. The incident took place at the West Texas Gas Plant located on Ferguson Lane – Reagan county, Texas. This request specifically includes, but is not limited to, the following:

1. all photographs (whether color, black/white, still or video) in the applicable format originally utilized and maintained;
2. all witness statements;
3. any fatality packets;
4. any and all incident reports; preliminary, investigative, handwritten and final reports;
5. all diagrams and/or measurements taken at the scene; and
6. any and all violations and citations as well as proceedings, contests, correspondence, pleadings, and resolutions or dispositions of same.

If there is any further costs associated with this request, please let me know as we will certainly pay any appropriate fees. Your timely response to this public information request is greatly appreciated.



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Should you have any questions or concerns, please do not hesitate to call.

Respectfully submitted,

Brian C. Steward  
San Antonio Office

BCS/nh